# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

In Re:

: Case No. 14-54951

Robyn A. Williams

: Chapter 13

: Judge Preston

Debtor(s).

## **MOTION TO WAIVE PAY ORDER**

Now comes the Debtor, Robyn Williams, through counsel, who hereby requests that payments to the Chapter 13 Trustee be made directly by the Debtor rather than by payroll deduction.

## **MEMORANDUM IN SUPPORT OF MOTION**

The Debtor requests direct payments to the Chapter 13 Trustee because she works in a financially sensitive position within a mortgage firm and fears that her continued employment may be jeopardized. Debtor agrees that if she becomes more than 30 days past due, the Trustee will upload a wage deduction order.

Wherefore, the Debtor respectfully requests that payments to the Chapter 13 Trustee be made directly by the Debtor rather than by payroll deduction.

Respectfully submitted,

/s/ James E. Nobile
James E. Nobile (0059705)
Nobile & Thompson Co., L.P.A.
4876 Cemetery Road
Hilliard, Ohio 43026
614-529-8600
614-529-8656 Fax

jenobile@ntlegal.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2014, a true copy of the foregoing Motion for Direct Pay was served upon the following registered ECF participants, **electronically** through the court's ECF System at the email address registered with the court: Frank M. Pees, Chapter 13 Trustee and The Office of the U.S. Trustee and on the following by **ordinary U.S. Mail, postage pre-paid,** addressed to:

Robyn Williams 7565 Creekbend Dr. Pickerington OH 43147

/s/ James E. Nobile

James E. Nobile (0059705)

Nobile & Thompson Co., L.P.A.

#### Form 20A NOTICE OF MOTION

The Debtor(s) has/have filed papers with this Court requesting the relief sought in the Motion enclosed with this NOTICE.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to GRANT the relief requested in the enclosed MOTION, or if you want the Court to consider your views on the MOTION, then on or before **21 DAYS FROM THE DATE SET FORTH IN THE CERTIFICATE OF SERVICE OF THIS MOTION**, you or your attorney must:

- 1. File with the Court, a written response to the MOTION expressing your objection or viewpoint. The response is to be filed with the Clerk of Courts at 170 N. High St. Columbus, Ohio 43215.
  - If you mail your written response to the Court for filing by the Clerk, you must mail it early enough so the Court will **receive** it on or before the date stated above.
- 2. You must also mail a copy of the written response to the Debtor(s) at the address listed on the front of this paper entitled Certificate Of Service.
- 3. You must also mail a copy of the written response to **Nobile & Thompson Co., L.P.A., 4876 Cemetery Road, Hilliard, OH 43026.**
- 4. Finally, you must attend any Court hearing scheduled to consider this MOTION. The Court will likely schedule an oral hearing and serve only those parties who have in fact filed a written response.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the MOTION and may enter an order granting that relief.